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May 2, 2003

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Deployment of Wireline Services Offering Advanced Telecommunications Capability*; WC Docket No. 01-338 (Triennial Review)

Dear Ms. Dortch:

On Thursday, May 1, 2003, Brad M. Sonnenberg, Senior Vice President and General Counsel, Susan Davis, Vice President, and Praveen Goyal, Senior Counsel, all of Covad Communications Company, together with Phil Verveer of Willkie, Farr and Gallagher, and James Derderian of the Stanton Park Group, met with Commissioner Kevin Martin and Emily Willeford regarding the above-referenced dockets. In the course of the meeting, representatives of Covad responded to Commissioner Martin's specific request to discuss Covad's February 24, 2003, and February 25, 2003, ex parte filings in these dockets.

The substance of the meeting is reflected in those prior ex parte filings. In particular, Covad emphasized that, to best effectuate the Commission's three-year transition from line sharing onto line-split and standalone loops, the Commission needed to ensure that line splitting and standalone loop alternatives are truly operationally available from the incumbent LECs. Under this transition mechanism, state commissions would ensure that incumbent LEC line splitting and standalone loop unbundling obligations are met, in conjunction with operation of the Commission's transition period.

Respectfully submitted,

/s/ Jason Oxman

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